

PATRICK L. FORTE  
Attorney at Law  
State Bar #80050  
One Kaiser Plaza, #480  
Oakland, CA 94612  
Telephone: (510) 465-3328

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In Re: Chapter 13  
No: 06-41945 RN13  
THOMAS LEE ROBINSON, JR.

Debtor.

**MOTION TO MODIFY CHAPTER 13  
PLAN; NOTICE TO CREDITORS OF  
DEADLINE TO REQUEST A HEARING**

The above named debtor requests that his Chapter 13 Plan be modified as follows:

Debtor shall surrender the 2003 Mitsubishi Montero to AmeriCredit Financial Services. Commencing April, 2007, debtor's plan payment shall be \$100.00 per month. Unsecured, nonpriority creditors shall be paid on a pro tanto basis. Any plan arrearages shall be forgiven.

The modification is sought on the following grounds:

Debtor is no longer being offered overtime and his net monthly income has been reduced.

NOTICE IS HEREBY GIVEN:

(i) That Local Rule 9014-1 of the United States Bankruptcy Court for the Northern District of California prescribes the procedures to be followed and that any objection to the requested relief, or a request for

1 hearing on the matter must be filed and served upon the undersigned  
2 within twenty (20) days of mailing of this notice;

3 (ii) That a request for hearing or objection must be accompanied by  
4 any declarations or memoranda of law the party objecting or requesting  
5 wishes to present in support of its position;

6 (iii) That if there is not a timely objection to the requested relief  
7 or a request for hearing, the Court may enter an order granting the  
8 relief by default; and

9 (iv) That the undersigned will give at least ten (10) days written  
10 notice of hearing to the objecting or requesting party, and to any  
11 trustee or committee appointed in the case, in the event an objection or  
12 request for hearing is timely made.

13 Dated: March 29, 2007.

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15 /s/ Patrick L. Forte  
16 Patrick L. Forte  
17 Attorney for Debtor  
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